

CORRES. CONTROL
INCOMING LTR NO.

01087 RF 98

DUE DATE
ACTION



Department of Energy

ROCKY FLATS FIELD OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

JUL 28 1977

98-DOE-03783

[illegible]

Mr. Tim Rehder
U.S. Environmental Protection Agency, Region VIII
Rocky Flats Project Manager
999 18th Street, Suite 500
Denver, Colorado 80202-2466

Dear Mr. Rehder:

The purpose of this correspondence is to inform you that the Operable Unit (OU)1 and OU2 Interim Measures/Interim Remedial Action (IM/IRA) decision document modifications that were initiated last summer have been completed. The administrative transfers included in the modifications will be documented in this letter.

OU2 IM/TRA Modification

On July 11, 1997, the Environmental Protection Agency (EPA) approved a modification to the *Final Surface Water Interim Remedial Action Plan Environmental Assessment and Decision Document South Walnut Creek Basin*, October 1994 (OU2 IM/IRA). The modification had three primary objectives: to create a stand-alone decision document for the reactive metal treatment system at the Mound Site Plume, to administratively transfer the monitoring obligations for Seeps SW061 and SW132 to the Integrated Monitoring Plan (IMP), and to eliminate OU2 IM/IRA authority over the Consolidated Water Treatment Facility (CWTF) in Building 891.

The first objective was met when the Mound Site Plume Decision Document was approved in September 1997. Installation of the reactive metal treatment system is under way.

The EPA conditioned completion of the second objective upon actual transfer of the Seeps SW061 and SW132 monitoring obligations to the Integrated Monitoring Plan (IMP). Page 2-45 of the Draft IMP is enclosed to document that transfer. The operator of the CWTF has relinquished responsibility for sampling to the Rocky Mountain Remediation Services (RMRS) Surface Water Group.

COR. CONTROL	X	X
ADMN. RECORD	X	X
PATS/T130G		

Reviewed for Addressee
Corres. Control RFP

Date 7/29/98 By AK

Ref Ltr. #

DOE ORDER # 5400.1

ADMIN RECORDS

BZ -A-00050

Although the IMP has not been finalized, the Department of Energy (DOE) feels that the administrative transfer is complete. The IMP working groups have assumed responsibility for the monitoring, and, for the first time, the sampling is being conducted as part of the site-wide monitoring program. Consistent with the proposal, completion of the administrative transfers has conveyed authority for decision making regarding the monitoring of Seeps SW061 and SW132 to the IMP.

In satisfaction of the third objective, completion of the administrative transfer terminates the OU2 IM/IRA, severing its authority over the CWTF.

OU1 IM/IRA Modification

In a letter dated August 27, 1997, the EPA conditionally approved a modification to the *Interim Measures/Interim Remedial Action Plan and Decision Document, 881 Hillside Area Operable Unit No. 1*, January 1990 (OU1 IM/IRA). The modification had two primary objectives: to create a single, discrete, identifiable regulatory authority to govern operations at the CWTF; and to administratively transfer monitoring obligations for the collection well, the french drain, and the Building 881 footing drain to the IMP.

The EPA requested that the DOE update attachments 1 and 2 to the letter in regard to the proposed modification. Attachment 1, a chart, illustrated the elements of the original OU1 and OU2 IM/IRAs and the strategy for integrating the two modifications. The requested updates have been incorporated, and the revised chart, now entitled "Summary of Modifications to OU1 and OU2 IM/IRAs," is enclosed. Changes to attachment 2 are not required, because it specifically recognizes the modifications to the OU1 CAD/ROD that are currently under development.

The DOE submitted a response to the other comments contained in the August 27, 1997, letter on October 2, 1997, and has modified attachment 2 accordingly. The DOE believes this meets the first objective. To that end, the CWTF is currently being operated in accordance with the Sampling and Analysis Plan and Operational Framework provided in attachment 2.

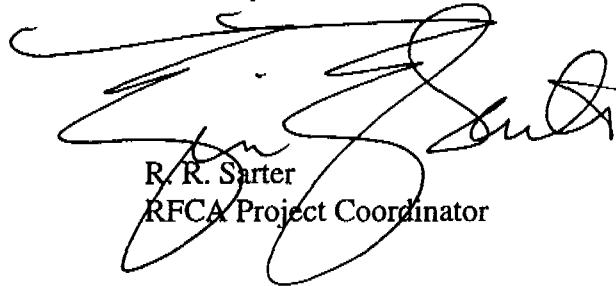
The administrative transfer of monitoring obligations for the collection well, the french drain, and the Building 881 footing drain to the has also been made. Pages 3-15 and E-1 of the Draft IMP are enclosed as documentation. Again, completion of the administrative transfers has also conveyed authority for all decision-making to the IMP.

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The operator of the CWTF has relinquished responsibility for sampling to the RMRS Groundwater Group, and the sampling is being performed on a quarterly basis, consistent with the original OU1 IM/IRA. This will continue until the sample locations are fully evaluated under the IMP.

If you should have any technical questions regarding this submittal, please contact Norma I. Castaneda at (303) 966-4226 or contact me at (303) 966-7252.

Sincerely,



R. R. Sarter
RFCA Project Coordinator

Enclosures

cc w/Encs:

G. Kleeman, EPA
C. Spreng, CDPHE
A. Rampertaap, EM-40, HQ
Administrative Record

cc w/o Encs:

S. Gunderson, CDPHE
S. Tarlton, CDPHE
J. Legare, AMEC, RFFO
B. April, RLG, RFFO
R. Tyler, ERWM, RFFO
N. Castaneda, ERWM, RFFO
L. Butler, K-H
D. Shelton, K-H

Summary of Modifications to OU1 and OU2 IM/IRAs

OU1

Interim Measures/Interim Remedial Action Plan and Decision Document 881 Hillside Area, Operable Unit No. 1, January 1990, "OU1 IM/IRA"

IHSS 119.1 Collection Well (collection, treatment and monitoring)

IHSS 119.1 French Drain (collection, treatment and monitoring)

881 Footing Drain (monitoring only, EPA letter dated 9/22/94)

OU1 Treatment System

OU 1 CAD/ROD

Operable Unit 1: 881 Hillside, March, 1997 (to be modified)

- 1) Continue to collect and treat groundwater from Collection Well at CWTF (B891).
- 2) Monitor Collection Well and French Drain under IMP.
- 3) Retain French Drain as groundwater barrier.
- 4) Release water from French Drain to South Interceptor Ditch.

Consolidate OU1 and OU2 Treatment System, CDPHE/EPA letter dated 9/14/95

Major Modification to OU1 IM/IRA

Letter modification to create CERCLA "Consolidated Water Treatment Facility" at B891

- 1) Continue to use location and action-specific ARARs in existing OU1 IM/IRA.
- 2) Present chemical-specific, RFCA-based ARARs in new CWTF SAP. Eliminate constituents never ID'd at RFETs and Rocky Mountain Arsenal constituents.
- 3) Continue to rely on IA IM/IRA as authority to bring incidental waters into B891. Note that waste acceptance "guidance" in IA IM/IRA is being changed to reflect CDPHE WWTU Policy.
- 4) Transfers 881 Footing Drain monitoring obligations to IMP and eliminates all OU1 IM/IRA groundwater monitoring obligations.

OU2

Final Surface Water Interim Measures/Interim Remedial Action Plan/Environmental Assessment and Decision Document South Walnut Creek Basin, October 1994, "OU2 IM/IRA"

SW059 (collection, treatment and monitoring)

SW061 (monitoring only, letter dated 4/28/94)

SW132 (monitoring only, letter dated 4/28/94)

OU2 Treatment System

Major Modification to OU2 IM/IRA

New replacement document entitled "Final Mound Site Plume Decision Document".

- 1) New document governs reactive metal treatment of Mound Site VOC Plume (SW059).
- 2) Transfers monitoring obligations for SW061 and SW132 to IMP and eliminates all OU2 IM/IRA groundwater monitoring obligations.
- 3) Eliminates all OU2 IM/IRA authority over CWTF (B891).
- 4) Throws away the OU2 IM/IRA.

DRAFT

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

INTEGRATED MONITORING PLAN

May 1998

Responsible Organization: Environmental Management & Compliance

Effective Date:
May 1998

Periodic review frequency: 1 year from the effective date

Reviewed for
Classification/UNCL:

By _____

Date _____

RFETS Integrated Monitoring Plan

- The specific project plan must specify an adequate monitoring method.
- Acceptable Decision Error Rates for Statistical Sampling Design:
 - The specific project plan must specify the decision criteria. Examples are shown in the decision rule section, above.

Monitoring Requirements:

Monitoring details will be specific to the project. The projected Performance monitoring to take place in FY98 is given in Table 2-9. Analyte suites and sample collection protocols are project-specific and are contained in the individual project plans for automated locations and are contained in the Surface Water Monitoring Technical Design Document which can be obtained from RMRS WM&T personnel. The Performance monitoring for FY99 will depend on Site closure activities and schedules.

Table 2-9
Projected FY98 Performance Monitoring Locations

Location Code	Location Description	Project	Supporting Documentation
GS27	Small ditch NW of B884	D&D of B889; Watershed Improvements evaluation	SW Monitoring Technical Design Document
GS32	Corrugated metal pipe (1.5') north of Solar Ponds in PA draining B779 area	D&D of B779	SW Monitoring Technical Design Document
GS37	Central Ave. Ditch north of B443	D&D of B123	SW Monitoring Technical Design Document
GS39	Corrugated metal pipe (1.0') north of 904 Pad draining 903/904 Pads and Contractor Yard areas	ER projects for 903 Pad; also serves as Source Location monitoring station for GS10 Source Evaluation	SW Monitoring Technical Design Document
SW061 ²⁰	S. Walnut Creek upstream of B995	OU2 Closure	OU2 Closure Document
SW132	S. Walnut Creek, outfall of culvert draining 700 and 900 Areas, south of B995	OU2 Closure	OU2 Closure Document

²⁰ The inclusion of SW061 and SW132 monitoring in the IMP completes the OU2 IM/IRA administrative transfer of former OU2 monitoring.

RFETS Integrated Monitoring Plan

- **Boundary Monitoring Wells:** Wells used to monitor the quality of groundwater leaving the eastern Site boundary.

In addition to this general groundwater monitoring scheme, specific requirements support regulatory directives. The following special categories are included as groundwater program elements:

- **D&D Monitoring Wells:** Wells used to monitor releases to groundwater from D&D activities on specific buildings. This requirement is specified in the IM/IRA for the Industrial Area (DOE, 1994a).
- **Performance Monitoring Wells:** Wells used to monitor the effect of a remedial treatment or source removal action. Performance monitoring of source remediation is specifically required in the RFCA ALF for groundwater. The French Drain Performance Monitoring Wells are included in this category and are specified in the French Drain IM/IRA Plan (DOE, 1992).
- **RCRA Compliance Wells:** Wells used in upgradient and downgradient monitoring of RCRA interim status units. This requirement is specified under 6 *Code of Colorado Regulations* (CCR) 1007-3. Wells monitored at the new landfill would be specified under 6 CCR 1007-2. Future retrievable storage facilities would also fall under the RCRA monitoring category.

The ALF also lists specific analytes and the associated action level or standard for groundwater and surface water. Groundwater currently needs to meet water protection standards. For purposes of DQO development, the RFCA requirements for groundwater to support the surface water protection classification, and all DQO decisions will reflect this. Each component of the groundwater program can be considered a decision element, and decision statements have been created for each component.

3.4.2.1 Plume Definition Wells

Problem Statement:

Are contaminants within groundwater plumes increasing in concentration with time or reaching Tier I Action Levels with the potential to impact surface water?

Problem Scope:

Plume definition wells lie within the currently known groundwater contaminant plumes and are located appropriately to monitor groundwater pathways that could affect surface water. Plume definition wells are designated based on knowledge of existing groundwater contaminant plumes and particle flow models that simulate groundwater pathways. It is possible that some plume definition wells have historically exceeded Tier I Action Levels. For these wells, only new exceedances of Tier I Action Levels involving

APPENDIX E-1
PROPOSED MONITORING WELLS

WELL NO	FREQUENCY	CLASSIFICATION	PLUME/AREA	DRIVERS	FORMATION	PURPOSE
5387	Semiannual	PE	881 Hillside	RFCA	AL	Plume Extent south of the 881 Hillside Plume
4887	Semiannual	PE	881 Hillside	RFCA	AL	Plume Extent south of the 881 Hillside Plume
4787	Semiannual	PE	881 Hillside	RFCA	AL	Plume Extent south of the 881 Hillside Plume
00797	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
11092	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
10992	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
10992	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
10992	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
10992	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
0487	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
891COLGAL	Quarterly	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
891COLWEL	Quarterly	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
SW13494	Quarterly	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
6285	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
3087	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
2987	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
23196	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
23096	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
07391	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
00491	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
02297	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
02497	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
02397	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
23996	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
41691	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
41591	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
10394	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
10294	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
06491	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
0385	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
P219189	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
P209289	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
P209289	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
12191	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
23296	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
10194	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
06091	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
05091	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
04991	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
04591	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
04091	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
03991	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
11891	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
3687	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
12691	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
05891	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
05391	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
10994	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
7086	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
P416889	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
P416789	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
P416689	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain
P314289	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for the French Drain